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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: TRIBUNE COMPANY  
FRAUDULENT CONVEYANCE  
LITIGATION

Consolidated Multidistrict Litigation

No. 11 MD 2296 (RJS)

No. 12 MC 2296 (RJS)

ORDER

RICHARD J. SULLIVAN, District Judge:

The Court is in receipt of the parties' joint proposal for a confidentiality stipulation and protective order to govern initial discovery, dated February 13, 2014. (Doc. No. 4332.) IT IS HEREBY ORDERED THAT the proposal is approved with two changes. First, with respect to the dispute resolution language in Paragraph 8, in the event that any party wishes to raise a designation dispute, the parties shall be required to submit a joint letter to the Court, not to exceed three pages, setting forth the nature of the dispute, the parties' respective positions, and the bases and authority on which they rely. Second, the parties shall abide by the following language with respect to the filing of sealed or redacted documents:

Notwithstanding any other provision of this Confidentiality Stipulation and Protective Order, no document may be filed with the Clerk under seal without a further Order of this Court addressing the specific documents to be sealed. Any application to seal shall be accompanied by an affidavit or affidavits and a memorandum of law, demonstrating that the standards for sealing have been met and specifically addressing *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006) and any other controlling authority. Nothing herein is intended to alter or modify the applicability of Federal Rule of Civil Procedure 5.2 to this case. The redactions expressly authorized by Rule 5.2 may be made without further application to the Court.

SO ORDERED.

Dated: February 18, 2014  
New York, New York

  
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RICHARD J. SULLIVAN  
UNITED STATES DISTRICT JUDGE